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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

_____	x	
IN RE: INSURANCE BROKERAGE	:	Hon. Faith S. Hochberg
ANTITRUST LITIGATION	:	MDL No. 1663
	:	
APPLIES TO ALL ACTIONS	:	Civil No. 04-5184 (FSH)
_____	x	

PLAINTIFFS' MOTION TO FILE UNDER SEAL

Pursuant to L. Civ. R. 5.3(c), Plaintiffs respectfully request this Court enter an order allowing them to file under the seal the deposition transcript of Michael O'Malley, taken on January 6, 2006, in connection with Plaintiffs' Joint Discovery Letter of January 12, 2006. Plaintiffs make this motion in order to comply with the terms set forth in the September 23, 2005 Corrected Discovery Confidentiality Order on Informal Application ("Confidentiality Order").

The parties have designated all deposition transcripts as "Attorneys' Eyes Only" under the Confidentiality Order. Section 4(a) of the Confidentiality Order describes that "Attorneys' Eyes Only" includes, *inter alia*, family, financial, medical or personnel records and non-public information relating as to which the producing party has an independent obligation of confidentiality to any entity other than defendants in this action. The deposition transcript of Michael O'Malley contains some of the above-described information. In order to protect the parties from injury, no other type of less restrictive relief is available.

Dated: January 12, 2006

Respectfully submitted,

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